

To whom it may concern,

I did just submit a letter. But after reading through 18-79A1, I had to respond to some specific concerns you had regarding the potential misuse of IP, specifically those of people who use IP-CTS devices.

You had mentioned that given Bluetooth technology present in hearing aids, and the fact that few people used hearing aids that used the service pointed to potential over-use (since people could buy hearing aids).

I have to disagree with that connection. I have hearing aids and I also use Bluetooth to make phone calls.

Hearing aids are not like glasses in that they fully restore a person's hearing. Even with my cochlear implant, my hearing level is not that of normal communication levels.

The Bluetooth only helps to a point. It helps to not use the cell phone speaker to make a phone call (because even with the FCC ruling on hearing aid compatibility, phones are still limited).

InnoCaption has allowed me to enjoy phone calls and pairing this with Bluetooth has been wonderful. But if I was to not be able to use captioned phone service, I would not be able to understand most phone calls. I wouldn't be able to succeed in my business (psychotherapist, which requires much in the way of real-time communication).

The closest I'll come to the ability to use a phone like a hearing person is through InnoCaption, due to their live stenographers who directly transcribe phone calls and allow incoming and outgoing calls to be made with my native number (so I don't have to tell everyone I won't receive texts if called on the special number). I'm able to set my caller ID to be my main Verizon number and accept calls and texts due to InnoCaption's innovative technology.

I am pleased to see you support ASR. But please do not see this as a replacement. It serves its purpose as a way to make a phone call and receive phone calls when stenographers are not available. InnoCaption uses direct stenographer input, which is unlike the other services that exist which either exclusively use ASR or use less direct custom captioners: stenographers who, after listening to the call, speak into speech recognition software and generate captions based on that. This causes delayed captions.

In this modern world, we require technology to be up-to-date and able to handle demands and grow. Without the opportunity to grow, captioning apps will be abandoned and not updated. This happened with some of the applications that are available to caption cell phones.

InnoCaption came along and saw that there was much potential to improve quality of life through improving quality of captions and the ability to have incoming and outgoing calls. They

do this with technology that benefits from the hands-on development of their team. If this would be taken away, we couldn't benefit from the updates made available.

I can't tell you how much it helps to have updates include seemingly simple improvements that make a huge difference. At one point in time, the app required a phone call to be made again if one needed to use 4G instead of WiFi (due to a connection issue for example). Now, I'm able to switch to 4G from WiFi during a phone call, without the app requiring me to make another phone call. This came from an update.

In this modern world, technology is ever-evolving. Thus, funds are essential for continued growth to keep up with this modern world. InnoCaption finally has addressed an unmet need and they need funds to grow and be able to address new concerns that arise in the future.

I have tried multiple apps that rely on ASR and the quality has been poor due to the inability to gather specific information. It works well when the app uses it in combination with stenographers. I know that all phone calls will come in even if a stenographer isn't available, due to ASR, and also stenographers are able to come in when available to caption phone calls. In the past, before ASR, if a stenographer wasn't available, I wouldn't be able to see that I had a phone call because the call would be sent to voicemail, and not everyone leaves a voicemail. So, ASR has its place, but not as a replacement.

Specific information such as website addresses and addressing certain variables such as accents suffers with ASR. If someone is trying to share a real-life conversation that requires recognition of more complex word structure (a child trying to say a new word for example) or simple things that people with normal hearing take for granted, like codes for applications or services need accurate transcription. ASR cannot be a replacement, merely a supplement.

One other feature of InnoCaption is the stenographers input what they hear directly into the captioned conversation, rather than speaking what they've heard into a voice recognition app and having that be the captioned data I see.

This may be less costly, but it leads to much more delay and also less accuracy. So, InnoCaption really is striving for quality that can make us who have hearing loss be able to use the phone as close as possible to a hearing person's capability.

Less costly alternatives, such as those mentioned above, and amplified phones do not restore normalcy into my life the way captioned service (that features stenographers) does.

In wearing hearing aids, I receive limited benefit, and adding amplification only makes things louder, not clearer. A well-programmed hearing aid allows any phone with reasonable amplification to be used, and yes, while it may help a bit, it doesn't prevent me from spending much of the conversation guessing as to what has been said. Now, I can pursue my career with less fatigue. I'm guessing less of what is said on the phone so my fatigue level is much better.

The less costly alternatives don't work the way InnoCaption does. I consider myself well-informed as at one point I considered becoming an audiologist. But now I'm a psychotherapist who helps those with partial hearing loss thrive in their lives.

Thank you for reading!

Patrick Tully